

POL SINELLI PC  
Bradley R. Gardner, Esq.  
600 Third Avenue, 42<sup>nd</sup> Floor  
New York, New York 10016  
(212) 684-0199  
[bgardner@polsinelli.com](mailto:bgardner@polsinelli.com)

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

WILMINGTON TRUST, NATIONAL ASSOCIATION, AS  
TRUSTEE FOR THE BENEFIT OF THE REGISTERED  
HOLDERS OF COREVEST AMERICAN FINANCE 2020-  
1 TRUST MORTGAGE PASS-THROUGH  
CERTIFICATES,

Case No. 6:23-CV-06662-EAW

Plaintiff,

-against-

HIRSCHHORN ESTATES LLC, MEYER HIRSCHHORN,  
CITY OF ROCHESTER and JOHN DOE NO. I THROUGH  
JOHN DOE NO. XXX, inclusive, the last thirty names being  
fictitious and unknown to plaintiff, the persons or parties  
intended being the tenants, occupants, persons or  
corporations, if any, having or claiming an interest in or lien  
upon the premises described in the complaint,

Defendants.

**DECLARATION OF BRADLEY R. GARDNER IN SUPPORT OF  
LENDER'S MOTION TO APPOINT A RECEIVER**

BRADLEY R. GARDNER, pursuant to 28 U.S.C. § 1746 and under penalties of perjury,  
declares that the following is true and correct:

1. I am an attorney admitted to practice before this Court and am an associate with the law firm of Polsinelli PC, the attorneys for Plaintiff Wilmington Trust, National Association, as Trustee for the benefit of the registered holders of Corevest American Finance 2020-1 Trust Mortgage Pass-Through Certificates (“**Lender**”). I am fully familiar with the facts and the proceedings of this case.

2. I submit this Declaration in support of Lender’s Motion for an Order to Appoint a Receiver.

3. Attached hereto as **Exhibit A** is proposed form of Order appointing a receiver.

Dated: New York, New York  
November 22, 2023

POL SINELLI PC

By: /s/ Bradley R. Gardner  
BRADLEY R. GARDNER, ESQ.  
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New York, New York 10016  
(212) 684-0199  
[bgardner@polsinelli.com](mailto:bgardner@polsinelli.com)

*ATTORNEYS FOR PLAINTIFF*